

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter 7

**NOTICE OF APPLICATIONS FOR ALLOWANCE OF  
COMPENSATION AND EXPENSE REIMBURSEMENT  
AND HEARING THEREON IF NECESSARY**

PLEASE TAKE NOTICE the law firm of Tavenner & Beran, PLC (“**Tavenner & Beran**”), as counsel for Lynn L. Tavenner, Chapter 7 Trustee (the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC, and other Estate professionals filed (or will be filing) with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) the following:

- 1) The *Sixth Interim Application of Tavenner & Beran, PLC for Allowance of Compensation and Expense Reimbursement as Counsel to the Chapter 7 Trustee*, wherein Tavenner and Beran, PLC, seeks interim approval of compensation in the amount of \$237,850.00<sup>2</sup> and reimbursement of expenses in the amount of \$1,729.13 for the period August 1, 2021, to October 31, 2021;
- 2) The *Second Interim Application of Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel to the Trustee, For Allowance of Compensation and Reimbursement of Expenses Incurred* wherein Quinn seeks interim approval of hourly compensation in the amount of \$93,541.23<sup>3</sup> contingency compensation in the amount of

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

<sup>2</sup>Tavenner & Beran has not charged the Estate for time consulting/corresponding with the Trustee. This has saved the Estate over \$64,700 in the time period covered by the Application and is yet another of the firm’s efforts to provide for efficient administration of bankruptcy cases and to provide a greater return for creditors. Furthermore, Tavenner & Beran did not bill all of its actual, recorded time incurred in connection with certain settlement conferences, mediations, and other matters.

<sup>3</sup> This amount reflects a ten (10) percent discount off of Quinn’s standard hourly rates.

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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

\$4,527,600.00, and reimbursement of expenses in the amount of \$29,096.13 for the period August 1, 2021, to October 31, 2021;

- 3) The *Fourth Interim Application of CR3 Partners, LLC for Allowance of Compensation and Expense Reimbursement as Financial Advisor for the Chapter 7 Estate*<sup>3</sup> wherein Cr3 seeks interim approval of compensation in the amount of \$27,471.15<sup>4</sup> for the period August 1, 2021, to October 31, 2021; and
- 4) Application for Compensation of Professional Accountant on behalf of Barry Strickland & Company, Certified Public Accountants seeking interim approval of compensation in the amount of \$6,588.70 from May 5, 2021 to November 15, 2021.

(collectively, the “**Applications**” and each an “**Application**”). Copies of the Applications may be obtained by written request to [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com).

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Applications carefully and discuss them with your attorney, if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE FURTHER NOTICE** on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Applications, or if you want the Court to consider your views on the Applications, then, by December 14, 2021 (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Applications pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Applications as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

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<sup>4</sup> In an effort to assist the Trustee in reducing administrative expenses of the Estate, CR3 Partners has voluntarily reduced its fees by 5 percent.

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT**, if an Objection is timely filed, the Court will entertain the Applications on December 21, 2021, at 11:00 a.m. (or such time thereafter as the matter may be heard). In accordance with Richmond General Order 20-5, the omnibus hearing scheduled for December 21, 2021, at 11:00 a.m. in the LeClairRyan, PLLC Case No. 19-34574 will be conducted via Zoom with a listen-only line available via:

**Zoom registration link:**

<https://www.zoomgov.com/meeting/register/vJIsd-qqqz8tG9qsUkSU3LiI8AdYy70rypk>

Listen-only conference line:  
Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 122121

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Procedures before filing any written response.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

**LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

Dated: November 30, 2021  
Richmond, Virginia

By: /s/ Paula S. Beran  
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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court and/or the Case Management Order, I certify that on this 30th day of November 2021, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the Case Management Order; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran  
Counsel for Lynn L. Tavenner, Chapter 7 Trustee